

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Amendment of Section 90.20(e)(6) of the)	RM- 11135
Commission's Rules Regarding)	
Stolen Vehicle Recovery Systems)	

REPLY COMMENT OF LOJACK CORPORATION

LoJack Corporation ("LoJack"), by its attorneys, hereby replies to the comments on its Petition for Rulemaking,¹ which proposed that the Commission amend 47 C.F.R. § 90.20(e)(6) ("Section 90.20(e)(6)" or "the rule"), the rule governing Stolen Vehicle Recovery System ("SVRS") operations on 173.075 MHz.²

DISCUSSION

It is readily apparent from the comments that there is widespread support for the changes to the SVRS rule proposed by LoJack. Almost one-hundred commenting parties -- mostly law enforcement agencies located throughout the country -- have filed comments in support of LoJack, as has Motorola Corporation. LoJack has received support from the associations of police chiefs of Massachusetts, New York and New England, as well as major law enforcement entities such as the Georgia State Patrol, the Miami-Dade Police Department, the City of Houston Police Department and the San Diego County Sheriff's Department. Significantly, no comments were filed opposing LoJack's petition.

¹ *In the Matter of Amendment of Section 90.20(e)(6) of the Commission's Rules Regarding Stolen Vehicle Recovery Systems*, Petition for Rulemaking (filed Oct. 25, 2004) ("Petition").

² LoJack also sought conforming changes to US Footnote 312 of the Table of Frequency Allocations, which is set forth in Section 2.106 of the rules.

In its Petition for Rulemaking, LoJack sought: 1) to broaden the scope of Section 90.20(e)(6) to permit the use of 173.075 MHz for public safety and security purposes in addition to stolen vehicle recovery; and 2) to change the technical requirements for 173.075 MHz.³ As LoJack noted in its comments, taking advantage of today's mobile and GPS technologies on the SVRS spectrum would allow it to offer expanded public safety and security services to law enforcement.⁴ The comments support such use of the spectrum.

The commenting parties urge the Commission to adopt LoJack's proposal to allow them access to enhanced SVRS technologies. They note that this would vastly improve the operations of law enforcement by providing real-time information related to the location, tracking and recovery of stolen assets, thereby reducing the time needed to recover these assets and resulting in far less damage to the assets. They also note that use of the new technologies will allow law enforcement officers to carry out their missions in a safer manner.⁵

Additionally, the commenting parties explain that the ability to use the SVRS frequency for other law enforcement purposes would enhance their crime fighting capabilities. For example, the County Sheriff of Galveston County, Texas, notes that his organization is responsible for the safety of two major ports as well as a major petrochemical complex.⁶ For this reason, the Sheriff explains that it would benefit from using the LoJack system for the rapid

³ Petition at 1-2. LoJack requested the following technical changes to the rule: 1) increased maximum base station ERP to 500 watts and "VLU" transmitter output power to 5 watts to compensate for the reduced range of narrowband channels; 2) use of digitally modulated emissions, in addition to the F1D and F2D modulation schemes already specified in the rules; 3) elimination of limitations on duty cycles to enable parallel wideband and narrowband operations and the provision of additional public safety and security services; 4) licensing of mobile transceivers by rule, to permit nationwide activation by mobile telephony transmissions; and 5) elimination of the requirement for Channel 7 interference studies, as no longer necessary. *See* Petition at 7-12.

⁴ Comments of LoJack at 2.

⁵ *See e.g.*, Comments of the City of Ontario Police Department and Comments of the Georgia State Patrol.

⁶ Comments of Gean Leonard, Sheriff, Galveston County.

recovery of high-risk cargo that move through the County.⁷ As well, commentators support the use of 173.075 MHz for other public safety related services, such as tracking individuals at risk and providing real time automatic notification of severe accidents.

CONCLUSION

It is in the public interest to provide improved and expanded services to the public via law enforcement agencies, as LoJack proposes. The support of the nearly one-hundred commentators, almost all law enforcement entities, confirms this. For these reasons, LoJack requests the Commission allow the SVRS frequency to be used to provide additional public safety services and to conform to new technical requirements. Accordingly, for the reasons set forth herein, in LoJack's initial comments and in the Petition for Rulemaking, LoJack requests that its petition be granted.

Respectfully submitted,

LoJack Corporation

/s/Henry Goldberg

Henry Goldberg

Joseph A. Godles

Laura Stefani

GOLDBERG, GODLES, WIENER & WRIGHT

1229 19th Street, N.W.

Washington, D.C. 20036

(202) 429-4900

Its Attorneys

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⁷ *Id.*